

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Joint Petition for Forbearance from the)	
Current Pricing Rules for the Unbundled)	WC Docket No. 03-189
Network Element Platform)	
_____)	

**COMMENTS OF THE
UNITED STATES TELECOM ASSOCIATION**

The United States Telecom Association (USTA),¹ through the undersigned and pursuant to Federal Communications Commission (FCC or Commission) Rules 1.415 and 1.419,² hereby submits its comments in response to the *Public Notice*³ in the above-docketed proceeding.⁴ In its Petition, Qwest, BellSouth, and SBC (Petitioners) cite to a similar petition filed by Verizon⁵ for forbearance from the Commission's current pricing rules for the unbundled network element platform, stating that they seek exactly the same relief requested by Verizon in its petition and that the grounds for the relief they seek is essentially identical to the grounds advanced in the Verizon Petition.

¹ USTA is the Nation's oldest trade organization for the local exchange carrier industry. USTA's carrier members provide a full array of voice, data and video services over wireline and wireless networks.

² 47 C.F.R. §§ 1.415 and 1.419.

³ *Public Notice*, WC Docket No. 03-189, DA 03-2679 (rel. Aug. 18, 2003) soliciting comment on the Joint Petition of Qwest, BellSouth, and SBC for Expedited Forbearance from the Commission's Current Pricing Rules for the Unbundled Network Element Platform (*Public Notice*).

⁴ Joint Petition of Qwest Corporation, BellSouth Telecommunications, Inc. and SBC Communications Inc. for Expedited Forbearance, WC 03-189, filed July 31, 2003 (Petition).

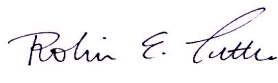
⁵ Petition of the Verizon Telephone Companies for Forbearance from the Current Pricing Rules for the Unbundled Network Element Platform, WC Docket No. 03-157, filed July 1, 2003 (Verizon Petition).

Accordingly, USTA reiterates and incorporates by reference the comments it filed in support of the Verizon Petition.⁶ USTA urges the Commission to expeditiously move forward with the rulemaking it has initiated to reform its current total element long-run incremental cost (TELRIC) pricing rules. USTA also urges the Commission to grant the interim relief requested in the Petition on the basis that the Petitioners have demonstrated a justifiable need for the relief and that they have met the forbearance requirements of Section 10 of the Communications Act of 1934, as amended (Act).

For the above reasons, USTA urges the Commission to grant the relief requested by Qwest, BellSouth, and SBC in their Joint Petition.

Respectfully submitted,

UNITED STATES TELECOM ASSOCIATION

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September 22, 2003

⁶ See USTA Comments, *Petition of the Verizon Telephone Companies for Forbearance from the Current Pricing Rules for the Unbundled Network Element Platform*, WC Docket No. 03-157 (Aug. 18, 2003).

CERTIFICATE OF SERVICE

I, Meena Joshi, do certify that on September 22, 2003, the aforementioned Comments of The United States Telecom Association was electronically mailed to the following:

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/s/ _____
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